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DEC 23 1997

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

MM Docket No. 97-_____

In the Matter of:)
)
Amendment of § 73.202(b),)
Table of Allotments,) RM-_____
FM Broadcast Stations.)
(Florence and Killen, Alabama and)
and Lawrenceburg, Tennessee))

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RECONSIDERATION

Big River Broadcasting Corporation ("Big River"), licensee of FM broadcast stations WXFL(FM), Channel 241A, and WQLT(FM), Channel 297C, both Florence, Alabama, and H-M-S Broadcasting Co. ("H-M-S"), licensee of FM broadcast station WDXE-FM, Channel 240A, Lawrenceburg, Tennessee, (collectively "Petitioners"), by their attorneys, ^{1/} herewith petition for reconsideration of the attached December 16, 1997, statement of the Chief, Allocations Branch that the May 28, 1997, "Petition for Rulemaking" ("Petition") is "unacceptable for consideration". In support, the following is shown:

^{1/} Counsel for H-M-S has reviewed this petition for reconsideration and has authorized Counsel for Big River to execute the pleading on his behalf.

SUMMARY

1. Big River and H-M-S tendered, on May 28, 1997, their joint Petition to amend the Table of FM Allotments and to modify the licenses (1) for WXFL to specify operation on Channel 241C2 at Killen, AL (in lieu of Channel 241A at Florence, AL), (2) for WQLT(FM) to specify operation on Channel 297C1 (in lieu of Channel 297C) at Florence, AL, and (3) for WDXE-FM to specify operation on Channel 294A (in lieu of Channel 240A) at Lawrenceburg, Tennessee. The Petition was filed, as a single consolidated proposal, in response to the position taken by the Mass Media Bureau in litigation concerning earlier-filed one-step applications.

2. The proposed allotment of Channel 294A at Lawrenceburg, Tennessee, is fully-spaced to the allotment reference point for Channel 294A at Belle Meade, Tennessee. Furthermore, it was the permittee of WNPL(FM), Channel 294A, Belle Meade, Tennessee, who proposed, in its application for construction permit, to short-space the Channel 294A, Lawrenceburg, TN, reference point. As a condition of doing so, the permittee of WNPL voluntarily requested, and the Mass Media Bureau required the permittee of WNPL, to protect the Channel 294A, Lawrenceburg, TN, reference point by making use of the contour-protection methodology set forth in Section 73.215 of the Rules and Regulations, so that both H-M-S and Big River could

continue to pursue the upgrade of WDXE at the Channel 294A, Lawrenceburg, TN, reference point, and so that the WDXE upgrade proposal on Channel 294A would not be deemed short-spaced to WNPL at Belle Meade. Thus, it is inconsistent with the Bureau's prior actions for the Chief to now find the Petition short-spaced to the WNPL construction permit and "unacceptable for consideration."

BACKGROUND

3. In their Petition, Big River and H-M-S summarized the background that preceded the filing of the Petition, which Background is herewith incorporated by reference, rather than repeated in its entirety.

4. However, Petitioners wish to highlight certain critical facts. On March 22, 1996, H-M-S tendered a one-step application for a construction permit for minor modification of WDXE-FM, Lawrenceburg, TN, to change from Channel 240A to Channel 294A and to increase power at its licensed transmitter site and antenna height (File No. BPH-960322IB). This application specified a transmitter site whose coordinates (35° 15' 25" North, 87° 18' 24" West) were also used in the Petition and which describe, and which hereafter will be referred to as, the Channel 294A, Lawrenceburg, TN, reference point. Thus the WDXE, Channel 294A, Lawrenceburg, TN, reference point has been a matter of

public record since March 22, 1996, and has been recognized and protected by the Commission since that date.

5. Before filing this WDXE application, the Chief, Allocations Branch, had advised Petitioners not to file a petition for rulemaking, but rather to file the one-step upgrade application. The staff of the Audio Services Division initially agreed with the Chief's position and accepted the applications. However, the Mass Media Bureau later changed its mind and concluded that the WDXE application was "contingent" and dismissed it, indicating that H-M-S should have petitioned for rulemaking. Big River and H-M-S petitioned for reconsideration of the dismissal of their applications, and later applied for Commission review of the staff action dismissing the applications. That litigation is still pending before the Commission, and thus the WDXE application is still pending before the Commission. Nevertheless, in recognition of the Mass Media Bureau's change in its position, Big River and H-M-S tendered the "Petition".

BELLE MEADE, TENNESSEE

6. The Chief states in his December 16, 1997, letter that:

Although Figure 6 of the engineering statement accompanying the petition for rule making reflects a clearance of -0.5 kilometers between the Lawrenceburg

proposal and the allotment reference coordinates specified for Channel 294A at Belle Meade, Tennessee, at coordinates 36-11-08 and 86-45-15, the proposal is 9.1 kilometers (6 miles) short spaced to the construction permit authorization for Station WNPL(FM), Channel 294A, Belle Meade, at coordinates 36-08-27 and 86-51-56 (see File No. BMPH-970221ID).

This statement fails to take into consideration the fact that the permittee of WNPL, Belle Meade, TN, proposed to protect the Channel 294A, Lawrenceburg, TN, reference point, and that the Bureau granted the CP on this condition. The following background information will illuminate the critical facts.

Belle Meade, TN Application

7. On February 21, 1997, Mt. Juliet Broadcasting, Inc. ("MJB I"), permittee of WNPL(FM), Mt. Juliet, Tennessee, tendered a minor change application to change community of license from Mt. Juliet to Belle Meade ^{2/} and to change transmitter location to:

36° 08' 27" North, 86° 51' 56" West.

Attachment 1 contains the complete "Allocations Considerations" portion of MJB I's application. Therein, MJB I proposed to short-space the Channel 294A, Lawrenceburg, TN, reference point by 9.12

^{2/} MJB I did not, in its original application, request a waiver of the rule that prohibits an applicant from filing an application that specifies a channel or community that is not listed in the FM Table of Allotments. However, a few days later, MJB I submitted such a waiver request.

kilometers. However, MJB I elected to take advantage of the contour-protection provisions of Section 73.215 of the Rules and Regulations by proposing a directionalized signal that would protect the full Class A omni-directional operation of WDXE, Lawrenceburg, TN on Channel 294A, at the reference point specified in the March 22, 1996, application and later in the Petition.

Belle Meade, TN Petition for Rulemaking

8. Thereafter, on March 5, 1997, MJB I tendered a "Petition for Rulemaking and Request for Modification of Authorization", in what would become MM Docket No. 97-97, proposing the reallocation of Channel 294A from Mt. Juliet to Belle Meade, as it had earlier proposed in its minor change application. However, in its March 5 petition, MJB I specified a different reference point for Channel 294A at Belle Meade:

36° 11' 08" North, 86° 45' 15" West.

In doing so, MJB I demonstrated that this reference point site was fully-spaced to the Channel 294A, Lawrenceburg, TN, reference point previously specified by H-M-S in its application and later specified in the Petition. ^{3/} A complete copy of the Engineering

^{3/} MJB I calculated the actual spacing between the two reference points as 114.52 kilometers, which rounds to 115 kilometers -- the precise required spacing.

Statement from this March 5 petition for rulemaking is attached hereto as Attachment 2.

Notice of Proposed Rulemaking and Report and Order

9. The Chief adopted on March 12, 1997, seven (7) days after the tender of the MJBFI petition for rulemaking, a Notice of Proposed Rulemaking, which he released on March 21, 1997. Mt. Juliet and Belle Meade, Tennessee, 12 FCC Rcd. 3201 (1997). Therein, the Chief stated that:

Channel 294A can be allotted to Belle Meade in compliance with the Commission's minimum distance separation requirements with a site restriction of 13.6 kilometers northeast. 3/

3/ The coordinates for Channel 294A at Belle Meade are 36-11-08 NL and 86-45-15 WL.

Id., 12 FCC Rcd. at 3203. On July 16, 1997, the Chief adopted a Report and Order, released on July 25, 1997, which allotted Channel 294A at Belle Meade, specifying these same coordinates as the channel reference point. Mt. Juliet and Belle Meade, Tennessee, 12 FCC Rcd. 10481, 10484 (1997).

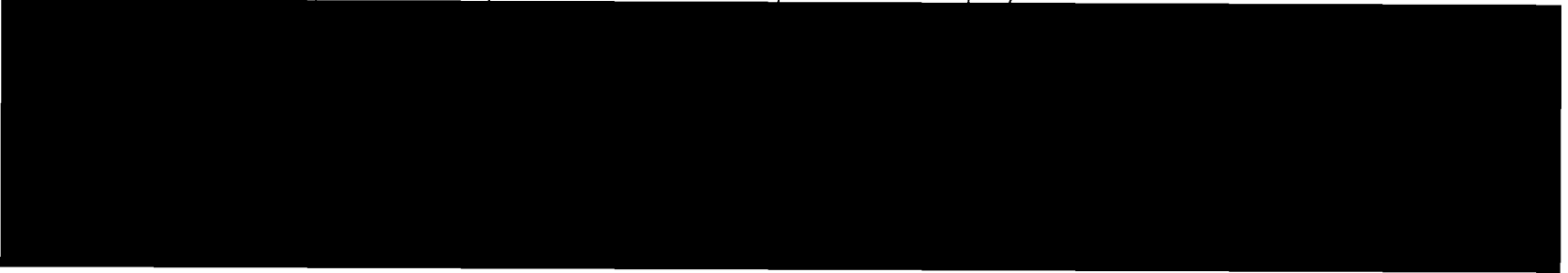
Construction Permit

10. On September 11, 1997, the Mass Media Bureau granted the MJBFI application for construction permit, specifying, in the construction permit, directionalized operation and contour

protection of Channel 294A at Lawrenceburg, TN, as MJBFI requested in its application. A copy of the Bureau's letter ^{4/} and the construction permit are attached hereto as Attachment 3.

11. Thus, the foregoing demonstrates that the Mass Media Bureau has recognized and protected the Channel 294A, Lawrenceburg, TN, reference point since March 22, 1996. For the Chief to now dismiss the Petition, because he believes the Lawrenceburg site is short-spaced, is not only inherently unfair to H-M-S and Big River but also inconsistent with the Bureau's recognition and protection of the Channel 294A, Lawrenceburg, TN, reference point to date. It was MJBFI who proposed to short-space the Channel 294A, Lawrenceburg, TN, reference point. The Bureau allowed MJBFI to do so only on the condition that it employ contour protection and protect full-Class A omni-directional operation by WDXE on Channel 294A at the Channel 294A, Lawrenceburg, TN, reference point. Thus, it is incorrect to now state, after the Bureau's series of actions regarding the WDXE and WNPL applications, that the Petitioners propose to short-space the Belle Meade construction permit. The Petitioners have

^{4/} The September 11, 1997, letter of the Assistant Chief, Audio Services Division, states that it was permissible for MJBFI to have an application pending for Channel 294A at Belle Meade during the pendency of the rulemaking proceeding. As a result the Bureau permitted MJBFI to secure protection for its application site during the pendency of the rulemaking proceeding. H-M-S and Big River simply seek the same



fully protected the Belle Meade reference point, and MJBFI has voluntarily and fully protected the Channel 294A, Lawrenceburg, TN, reference point. The Bureau issued a WNPL construction permit that fully protects the Channel 294A, Lawrenceburg, TN, reference point, and thus permits the acceptance of the Petition. The Bureau took these actions so that H-M-S and Big River could continue to seek to upgrade WDXE at the Channel 294A, Lawrenceburg, TN, reference point. The Chief's statement and action is in conflict with the long-standing Bureau position and requires reconsideration.

WHEREFORE, Big River and H-M-S request that the Chief reconsider his decision that the Petition is "unacceptable"; accept the Petition, and release a Notice of Proposed Rulemaking proposing to amend the FM Table of Allotments and to modify the licenses (1) for WQLT(FM) to specify operation on Channel 297C1 at Florence, Alabama, (2) for WXFL to specify operation on Channel 241C2 at Killen, Alabama, ^{5/} and (3) for WDXE-FM to specify operation on Channel 294A at Lawrenceburg, Tennessee.

^{5/} Referencing footnote 1 of the Chief's December 16, 1997, letter, the Petition ultimately seeks a Report and Order that modifies Big River's license for WXFL to specify Killen as the community of license. Accordingly, Big River would accept a condition in the Report and Order that it either amend its pending application (BPH-960322IF) to specify Killen as the community of license or dismiss that pending application and tender a new application that specifies Killen as the community of license.

Respectfully Submitted,


**BIG RIVER BROADCASTING
CORPORATION**

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December 23, 1997



Federal Communications Commission
Washington, D.C. 20554
DEC 16 1997

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Dear Sirs:

This is in response to the petition for rule making filed jointly on behalf of Big River Broadcasting Corporation ("Big River"), licensee of Stations WXFL(FM), Channel 241A and WQLT(FM), Channel 297C, both Florence, Alabama, and H-M-S Broadcasting Co. ("H-M-S"), licensee of Station WDXE-FM, Channel 240A, Lawrenceburg, Tennessee. Big River seeks to amend the Table of FM Allotments by substituting Channel 241C2 for Channel 241A at Florence, reallocating Channel 241C2 to Killen, Alabama, and modifying the authorization for Station WXFL(FM) accordingly. Additionally, to accommodate the Killen allotment while enabling Station WDXE-FM to increase its power to 6 kilowatts at Lawrenceburg, H-M-S seeks the substitution of Channel 294A for Channel 240A at Lawrenceburg, Tennessee. As a final step in the allotment proposal, Big River seeks to downgrade the facilities for Station WQLT(FM) to specify operation on Channel 297C1 in lieu of Channel 297C at Florence to accommodate the Lawrenceburg request.

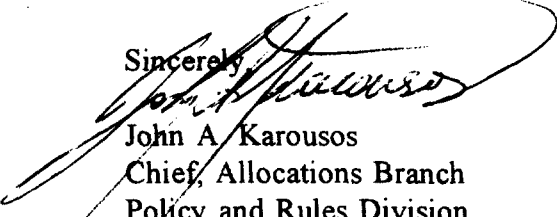
A staff engineering review of the proposal reveals that the Lawrenceburg phase of the rule making request contravenes the minimum distance separation requirements of Section 73.207(b)(1) of the Commission's Rules.¹ Although Figure 6 of the engineering statement

¹ We also note that the Killen aspect of the rule making request to reallocate Channel 241C2 to that community conflicts with Station WSFL(FM)'s one-step application to modify its facilities from Channel 241A to Channel 241C2 at Florence (File No. BPH-960322IF). The coordinates specified therein at 34-51-52 and 87-23-43 are also those requested for Killen. According to the Commission's records, although the referenced application was dismissed November 26, 1996, followed by a denial of reconsideration on July 1, 1997, an application for review of the denial remains pending for resolution. We also note that the Killen proposal is considerably short-spaced to the existing authorization of Station WDXE-FM, Channel 240A, Lawrenceburg, Tennessee, and is also subject to resolution of the application for review concerning Station WDXE-FM's one-step application (File No. BPH-960322IB) to operate on Channel 294A at Lawrenceburg.

accompanying the petition for rule making reflects a clearance of -0.5 kilometers between the Lawrenceburg proposal and the allotment reference coordinates specified for Channel 294A at Belle Meade, Tennessee, at coordinates 36-11-08 and 86-45-15, the proposal is 9.1 kilometers (6 miles) short spaced to the construction permit authorization for Station WNPL(FM), Channel 294A, Belle Meade, at coordinates 36-08-27 and 86-51-56 (see File No. BMPH-970221ID).

In light of the foregoing, the joint petition for rule making submitted on behalf of Big River Broadcasting Corporation and H-M-S Broadcasting Co. is unacceptable for consideration.

Sincerely,



John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

ATTACHMENT 1

2.0 ALLOCATION CONSIDERATIONS

Channel 294 is presently allotted to Mount Juliet, Tennessee, in Section 73.202(b) of the FCC Rules as a Class A facility. As outlined in Section 1.0 of this exhibit, a petition for rulemaking requesting the reallocation of Channel 294A from Mount Juliet, Tennessee, to Belle Meade, Tennessee, is being filed concurrently with the attached application. Table 2.0 is an FM allocation study showing the actual and required separations between the proposed facility and any applicable existing or proposed stations or allotments. This table shows that the proposed facility will be short spaced to two other facilities under the spacing requirements outlined in Section 73.207 of the FCC Rules:

WKDZ-FM(Allotment)	Oak Grove, KY	Channel 293C3
WDXE-FM(Application)	Lawrenceburg, TN	Channel 294A

These short spacings are permitted under Section 73.215 of the FCC Rules provided the necessary contour protection is provided to these short spaced stations. It should be noted that the separation between the proposed facility and both the allotment on Channel 293C3 in Oak Grove, Kentucky, and the WDXE-FM application fully complies with the table in Section 73.215 of the FCC Rules which specifies the minimum separation at which contour protection may be employed.

Since the proposed WNPL facilities will operate on a first adjacent channel to the Oak Grove allotment, Section 73.215 of the FCC Rules states that no overlap can occur between the 60 dBu contour of this allotment and the 54 dBu contour for the proposed operation of WNPL. Furthermore, no overlap can occur between the proposed WNPL 60 dBu contour and the 54 dBu contour for this allotment. As outlined in Section 73.215(b) of the FCC Rules, the contour projections for the Oak Grove allotment

assume operation from the allotment reference coordinates with an omnidirectional effective radiated power of 25 kilowatts at 100 meters above average terrain, the maximum facilities permitted for a Class C3 station. Terrain data from the NGDC 30 second database was used in projecting the predicted contours for this allotment. Tables 2.1(a) and 2.1(b) present the projections of the appropriate contours for this allotment assuming an antenna height of 269 meters above mean sea level.

Since the proposed WNPL facilities will operate cochannel to the facilities specified in the WDXE-FM application, Section 73.215 of the FCC Rules states that no overlap can occur between the 60 dBu contour for the proposed operation of WDXE-FM and the 40 dBu contour for the proposed operation of WNPL. Furthermore, no overlap can occur between the proposed WNPL 60 dBu contour and the 40 dBu contour for the facilities proposed in the WDXE-FM application. As outlined in Section 73.215(b) of the FCC Rules, the contour projections for the proposed operation of WDXE-FM assume operation with an omnidirectional effective radiated power of 6 kilowatts at 100 meters above average terrain, the maximum facilities permitted for a Class A station. Terrain data from the NGDC 30 second database was also used in projecting the predicted contours for WDXE-FM. Tables 2.2(a) and 2.2(b) present the projections of the appropriate contours for WDXE-FM assuming an antenna height of 376 meters above mean sea level.

Tables 2.3 (a) through 2.3(c) present the projections of the appropriate contours for the proposed operation of WNPL. The proposed contours were projected using the actual proposed operating facilities, including the proposed directional pattern detailed in Section 3.0 of this exhibit, and terrain data from the NGDC 30 second database. The appropriate contours for all of these facilities are shown in Figure 2.0. As can be

seen from this figure, the proposed WNPL facilities will provide the required protection to both of these facilities.

Finally, Table 2.0 shows that the proposed facility has adequate separation from all other facilities requiring consideration.

TABLE 2.0

FM ALLOCATION STUDY - CHANNEL 294A (106.7 MHz) - BELLE MEADE, TN

MOUNT JULIET BROADCASTING, INC.
BELLE MEADE, TN

STUDY COORDINATES: 36/08/27 86/51/56

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING*	NOTES
WDXEFM	Lawrenceburg, TN	240	A	105.88	10.0	
WXFL	Florence, AL	241	C2	149.54	15.0	7
WTAKFM	Hartselle, AL	291	C3	187.29	42.0	1
WKDZFM	Cadiz, KY	292	A	120.33	31.0	4
WKDZ-FM	Oak Grove, KY	293	C3	85.68	89.0	5, 11, 12
96-163	Clifton, TN	293	A	130.81	72.0	9
WSKZ	Chattanooga, TN	293	C	177.30	165.0	
WDXEFM	Lawrenceburg, TN	294	A	105.88	115.0	7, 11
WXPC	Horse Cave, KY	294	A	150.40	115.0	
WZZL	Reidland, KY	294	A	167.98	115.0	
WWZDFM	New Albany, MS	294	C2	260.76	166.0	
WKXDFM	Monterey, TN	295	C2	145.85	106.0	1
WZEZ	Madisonville, KY	295	A	147.74	72.0	
WWYN	McKenzie, TN	295	C1	174.77	133.0	
WDLG	Smiths Grove, KY	296	C2	95.04	55.0	1
96-123	Tullahoma, TN	296	A	100.06	31.0	9
WQLT	Florence, AL	297	C	180.19	95.0	

* Required Spacing Per Section 73.207 of The FCC Rules

Notes:

- | | |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application |
| 2 - Construction Permit | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed | 9 - Proposed Rulemaking |
| 4 - Move From This Channel Ordered | 10 - Rulemaking Petition |
| 5 - Move to This Channel Ordered | 11 - Short-Spaced |
| 6 - One Step Reference Site | 12 - Vacant Allotment |

WKDZ-FM (ALLOTMENT)
60.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP		DISTANCE TO CONTOUR (km)
			(dBk)	(kW)	
0.0 *	170.3	98.8	13.98	25.000	38.9
10.0	173.2	95.9	13.98	25.000	38.4
20.0	178.2	90.8	13.98	25.000	37.5
30.0	179.7	89.4	13.98	25.000	37.2
40.0	184.7	84.4	13.98	25.000	36.3
45.0 *	188.9	80.1	13.98	25.000	35.4
50.0	190.5	78.5	13.98	25.000	35.1
60.0	181.8	87.3	13.98	25.000	36.8
70.0	178.0	91.0	13.98	25.000	37.5
80.0	172.9	96.1	13.98	25.000	38.4
90.0 *	172.7	96.3	13.98	25.000	38.5
100.0	166.0	103.1	13.98	25.000	39.6
110.0	168.4	100.6	13.98	25.000	39.2
120.0	167.3	101.7	13.98	25.000	39.4
130.0	167.5	101.5	13.98	25.000	39.3
135.0 *	166.5	102.6	13.98	25.000	39.5
140.0	164.8	104.2	13.98	25.000	39.8
150.0	162.4	106.7	13.98	25.000	40.1
160.0	166.3	102.7	13.98	25.000	39.5
170.0	164.3	104.7	13.98	25.000	39.8
180.0 *	164.3	104.8	13.98	25.000	39.8
190.0	163.0	106.1	13.98	25.000	40.0
200.0	163.6	105.4	13.98	25.000	40.0
210.0	165.8	103.2	13.98	25.000	39.6
220.0	168.2	100.9	13.98	25.000	39.2
225.0 *	171.1	98.0	13.98	25.000	38.7
230.0	173.1	96.0	13.98	25.000	38.4
240.0	176.0	93.1	13.98	25.000	37.9
250.0	167.7	101.4	13.98	25.000	39.3
260.0	160.4	108.7	13.98	25.000	40.4
270.0 *	156.5	112.6	13.98	25.000	41.0
280.0	160.1	109.0	13.98	25.000	40.5
290.0	160.7	108.4	13.98	25.000	40.4
300.0	158.7	110.4	13.98	25.000	40.7
310.0	162.5	106.6	13.98	25.000	40.1
315.0 *	162.2	106.8	13.98	25.000	40.2
320.0	160.8	108.2	13.98	25.000	40.4
330.0	158.7	110.3	13.98	25.000	40.7
340.0	162.6	106.5	13.98	25.000	40.1
350.0	165.8	103.3	13.98	25.000	39.6

AVERAGE(*) = 169.1 meters

TABLE 2.1(a)

WKDZ-FM (ALLOTMENT)
PREDICTED 60 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

WKDZ-FM (ALLOTMENT)
54.0 dBu CONTOUR
(F(50,10) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk) (kW)		DISTANCE TO CONTOUR (km)
0.0 *	170.3	98.8	13.98	25.000	59.9
10.0	173.2	95.9	13.98	25.000	59.4
20.0	178.2	90.8	13.98	25.000	58.4
30.0	179.7	89.4	13.98	25.000	58.1
40.0	184.7	84.4	13.98	25.000	57.0
45.0 *	188.9	80.1	13.98	25.000	56.1
50.0	190.5	78.5	13.98	25.000	55.7
60.0	181.8	87.3	13.98	25.000	57.7
70.0	178.0	91.0	13.98	25.000	58.4
80.0	172.9	96.1	13.98	25.000	59.4
90.0 *	172.7	96.3	13.98	25.000	59.5
100.0	166.0	103.1	13.98	25.000	60.7
110.0	168.4	100.6	13.98	25.000	60.3
120.0	167.3	101.7	13.98	25.000	60.5
130.0	167.5	101.5	13.98	25.000	60.5
135.0 *	166.5	102.6	13.98	25.000	60.7
140.0	164.8	104.2	13.98	25.000	60.9
150.0	162.4	106.7	13.98	25.000	61.4
160.0	166.3	102.7	13.98	25.000	60.7
170.0	164.3	104.7	13.98	25.000	61.0
180.0 *	164.3	104.8	13.98	25.000	61.0
190.0	163.0	106.1	13.98	25.000	61.3
200.0	163.6	105.4	13.98	25.000	61.2
210.0	165.8	103.2	13.98	25.000	60.8
220.0	168.2	100.9	13.98	25.000	60.3
225.0 *	171.1	98.0	13.98	25.000	59.8
230.0	173.1	96.0	13.98	25.000	59.4
240.0	176.0	93.1	13.98	25.000	58.9
250.0	167.7	101.4	13.98	25.000	60.4
260.0	160.4	108.7	13.98	25.000	61.7
270.0 *	156.5	112.6	13.98	25.000	62.4
280.0	160.1	109.0	13.98	25.000	61.8
290.0	160.7	108.4	13.98	25.000	61.7
300.0	158.7	110.4	13.98	25.000	62.0
310.0	162.5	106.6	13.98	25.000	61.4
315.0 *	162.2	106.8	13.98	25.000	61.4
320.0	160.8	108.2	13.98	25.000	61.7
330.0	158.7	110.3	13.98	25.000	62.0
340.0	162.6	106.5	13.98	25.000	61.4
350.0	165.8	103.3	13.98	25.000	60.8

AVERAGE(*) = 169.1 meters

TABLE 2.1(b)

WKDZ-FM (ALLOTMENT)
PREDICTED 54 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

WDXE-FM(APP)
60.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP		DISTANCE TO CONTOUR (km)
			(dBk)	(kW)	
0.0 *	288.2	87.8	7.78	6.000	26.6
10.0	289.7	86.3	7.78	6.000	26.4
20.0	300.5	75.5	7.78	6.000	24.8
30.0	302.6	73.4	7.78	6.000	24.5
40.0	293.2	82.8	7.78	6.000	25.9
45.0 *	294.3	81.7	7.78	6.000	25.7
50.0	296.1	79.9	7.78	6.000	25.5
60.0	289.0	87.0	7.78	6.000	26.5
70.0	280.2	95.8	7.78	6.000	27.7
80.0	271.2	104.8	7.78	6.000	28.9
90.0 *	263.4	112.6	7.78	6.000	29.9
100.0	260.4	115.6	7.78	6.000	30.2
110.0	265.9	110.1	7.78	6.000	29.6
120.0	283.1	92.9	7.78	6.000	27.3
130.0	289.4	86.6	7.78	6.000	26.4
135.0 *	281.4	94.6	7.78	6.000	27.6
140.0	276.7	99.3	7.78	6.000	28.2
150.0	273.8	102.2	7.78	6.000	28.6
160.0	274.4	101.6	7.78	6.000	28.5
170.0	279.3	96.7	7.78	6.000	27.8
180.0 *	269.6	106.4	7.78	6.000	29.1
190.0	278.5	97.5	7.78	6.000	28.0
200.0	277.2	98.8	7.78	6.000	28.1
210.0	268.8	107.2	7.78	6.000	29.2
220.0	241.2	134.8	7.78	6.000	32.3
225.0 *	247.1	128.9	7.78	6.000	31.7
230.0	250.6	125.4	7.78	6.000	31.3
240.0	268.4	107.6	7.78	6.000	29.3
250.0	257.2	118.8	7.78	6.000	30.6
260.0	263.7	112.3	7.78	6.000	29.9
270.0 *	271.9	104.1	7.78	6.000	28.8
280.0	278.1	97.9	7.78	6.000	28.0
290.0	284.0	92.0	7.78	6.000	27.2
300.0	283.3	92.7	7.78	6.000	27.3
310.0	290.4	85.6	7.78	6.000	26.3
315.0 *	289.5	86.5	7.78	6.000	26.4
320.0	286.7	89.3	7.78	6.000	26.8
330.0	281.4	94.6	7.78	6.000	27.6
340.0	284.1	91.9	7.78	6.000	27.2
350.0	284.1	91.9	7.78	6.000	27.2

AVERAGE(*) = 275.7 meters

TABLE 2.2(a)

WDXE-FM (APP.)
PREDICTED 60 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

WDXE-FM (APP)
40.0 dBu CONTOUR
(F(50,10) Curves Utilized)

HEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk) (kW)		DISTANCE TO CONTOUR (km)
0.0 *	288.2	87.8	7.78	6.000	84.5
10.0	289.7	86.3	7.78	6.000	84.3
20.0	300.5	75.5	7.78	6.000	82.2
30.0	302.6	73.4	7.78	6.000	81.8
40.0	293.2	82.8	7.78	6.000	83.6
45.0 *	294.3	81.7	7.78	6.000	83.4
50.0	296.1	79.9	7.78	6.000	83.1
60.0	289.0	87.0	7.78	6.000	84.4
70.0	280.2	95.8	7.78	6.000	85.9
80.0	271.2	104.8	7.78	6.000	87.5
90.0 *	263.4	112.6	7.78	6.000	88.7
100.0	260.4	115.6	7.78	6.000	89.2
110.0	265.9	110.1	7.78	6.000	88.3
120.0	283.1	92.9	7.78	6.000	85.5
130.0	289.4	86.6	7.78	6.000	84.3
135.0 *	281.4	94.6	7.78	6.000	85.7
140.0	276.7	99.3	7.78	6.000	86.5
150.0	273.8	102.2	7.78	6.000	87.0
160.0	274.4	101.6	7.78	6.000	86.9
170.0	279.3	96.7	7.78	6.000	86.1
180.0 *	269.6	106.4	7.78	6.000	87.7
190.0	278.5	97.5	7.78	6.000	86.2
200.0	277.2	98.8	7.78	6.000	86.5
210.0	268.8	107.2	7.78	6.000	87.9
220.0	241.2	134.8	7.78	6.000	92.1
225.0 *	247.1	128.9	7.78	6.000	91.2
230.0	250.6	125.4	7.78	6.000	90.7
240.0	268.4	107.6	7.78	6.000	87.9
250.0	257.2	118.8	7.78	6.000	89.7
260.0	263.7	112.3	7.78	6.000	88.7
270.0 *	271.9	104.1	7.78	6.000	87.3
280.0	278.1	97.9	7.78	6.000	86.3
290.0	284.0	92.0	7.78	6.000	85.3
300.0	283.3	92.7	7.78	6.000	85.4
310.0	290.4	85.6	7.78	6.000	84.2
315.0 *	289.5	86.5	7.78	6.000	84.3
320.0	286.7	89.3	7.78	6.000	84.8
330.0	281.4	94.6	7.78	6.000	85.7
340.0	284.1	91.9	7.78	6.000	85.3
350.0	284.1	91.9	7.78	6.000	85.3

AVERAGE (*) = 275.7 meters

TABLE 2.2(b)

WDXE-FM (APP.)
PREDICTED 40 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

PROPOSED WNPL
60.0 dBu CONTOUR
(F(50,50) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	----- HORIZONTAL ----- RELATIVE FIELD (dBk) ERP (kW)			DISTANCE TO CONTOUR (km)
0.0 *	166.1	243.9	1.000	0.33	1.080	28.8
10.0	153.0	257.0	1.000	0.33	1.080	29.5
20.0	157.0	253.0	1.000	0.33	1.080	29.3
30.0	148.7	261.3	1.000	0.33	1.080	29.7
40.0	151.5	258.5	1.000	0.33	1.080	29.6
45.0 *	148.3	261.7	1.000	0.33	1.080	29.7
50.0	152.5	257.5	1.000	0.33	1.080	29.5
60.0	147.1	262.9	1.000	0.33	1.080	29.8
70.0	148.5	261.5	1.000	0.33	1.080	29.7
80.0	143.5	266.5	1.000	0.33	1.080	30.0
90.0 *	154.8	255.2	1.000	0.33	1.080	29.4
100.0	159.1	250.9	1.000	0.33	1.080	29.2
110.0	163.0	247.0	1.000	0.33	1.080	28.9
120.0	174.2	235.8	1.000	0.33	1.080	28.3
130.0	181.3	228.7	1.000	0.33	1.080	27.9
135.0 *	191.5	218.5	1.000	0.33	1.080	27.3
140.0	211.6	198.4	1.000	0.33	1.080	26.0
150.0	231.1	178.9	1.000	0.33	1.080	24.9
160.0	210.9	199.1	1.000	0.33	1.080	26.1
170.0	215.7	194.3	1.000	0.33	1.080	25.8
180.0 *	199.5	210.5	0.940	-0.20	0.954	26.0
190.0	196.1	213.9	0.780	-1.82	0.657	24.1
200.0	189.4	220.6	0.720	-2.52	0.560	23.6
210.0	200.3	209.7	0.740	-2.28	0.591	23.3
220.0	200.7	209.3	0.790	-1.71	0.674	24.0
225.0 *	200.1	209.9	0.830	-1.28	0.744	24.6
230.0	185.7	224.3	0.880	-0.78	0.836	26.1
240.0	185.6	224.4	1.000	0.33	1.080	27.6
250.0	180.8	229.2	1.000	0.33	1.080	27.9
260.0	192.6	217.4	1.000	0.33	1.080	27.2
270.0 *	180.2	229.8	1.000	0.33	1.080	28.0
280.0	161.7	248.3	1.000	0.33	1.080	29.0
290.0	150.1	259.9	1.000	0.33	1.080	29.6
300.0	155.7	254.3	0.800	-1.60	0.691	26.5
310.0	143.5	266.5	0.640	-3.54	0.442	24.4
315.0 *	154.3	255.7	0.640	-3.54	0.442	23.9
320.0	154.4	255.6	0.640	-3.54	0.442	23.9
330.0	155.3	254.7	0.680	-3.02	0.499	24.6
340.0	164.3	245.7	0.800	-1.60	0.691	26.0
350.0	179.5	230.5	1.000	0.33	1.080	28.0

AVERAGE(*) = 174.3 meters

TABLE 2.3(a)

PROPOSED WNPL
60 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

PROPOSED WNPL
54.0 dBu CONTOUR
(F(50,10) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	----- RELATIVE FIELD	HORIZONTAL (dBk)	----- ERP (kW)	DISTANCE TO CONTOUR (km)
0.0 *	166.1	243.9	1.000	0.33	1.080	43.6
10.0	153.0	257.0	1.000	0.33	1.080	44.6
20.0	157.0	253.0	1.000	0.33	1.080	44.3
30.0	148.7	261.3	1.000	0.33	1.080	45.0
40.0	151.5	258.5	1.000	0.33	1.080	44.8
45.0 *	148.3	261.7	1.000	0.33	1.080	45.0
50.0	152.5	257.5	1.000	0.33	1.080	44.7
60.0	147.1	262.9	1.000	0.33	1.080	45.1
70.0	148.5	261.5	1.000	0.33	1.080	45.0
80.0	143.5	266.5	1.000	0.33	1.080	45.4
90.0 *	154.8	255.2	1.000	0.33	1.080	44.5
100.0	159.1	250.9	1.000	0.33	1.080	44.2
110.0	163.0	247.0	1.000	0.33	1.080	43.8
120.0	174.2	235.8	1.000	0.33	1.080	42.9
130.0	181.3	228.7	1.000	0.33	1.080	42.2
135.0 *	191.5	218.5	1.000	0.33	1.080	41.2
140.0	211.6	198.4	1.000	0.33	1.080	39.2
150.0	231.1	178.9	1.000	0.33	1.080	37.3
160.0	210.9	199.1	1.000	0.33	1.080	39.3
170.0	215.7	194.3	1.000	0.33	1.080	38.8
180.0 *	199.5	210.5	0.940	-0.20	0.954	39.3
190.0	196.1	213.9	0.780	-1.82	0.657	36.2
200.0	189.4	220.6	0.720	-2.52	0.560	35.4
210.0	200.3	209.7	0.740	-2.28	0.591	34.9
220.0	200.7	209.3	0.790	-1.71	0.674	36.0
225.0 *	200.1	209.9	0.830	-1.28	0.744	36.9
230.0	185.7	224.3	0.880	-0.78	0.836	39.4
240.0	185.6	224.4	1.000	0.33	1.080	41.8
250.0	180.8	229.2	1.000	0.33	1.080	42.3
260.0	192.6	217.4	1.000	0.33	1.080	41.1
270.0 *	180.2	229.8	1.000	0.33	1.080	42.3
280.0	161.7	248.3	1.000	0.33	1.080	43.9
290.0	150.1	259.9	1.000	0.33	1.080	44.9
300.0	155.7	254.3	0.800	-1.60	0.691	40.0
310.0	143.5	266.5	0.640	-3.54	0.442	36.7
315.0 *	154.3	255.7	0.640	-3.54	0.442	36.0
320.0	154.4	255.6	0.640	-3.54	0.442	35.9
330.0	155.3	254.7	0.680	-3.02	0.499	37.0
340.0	164.3	245.7	0.800	-1.60	0.691	39.4
350.0	179.5	230.5	1.000	0.33	1.080	42.4

AVERAGE(*) = 174.3 meters

TABLE 2.3(b)

PROPOSED WNPL
54 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

PROPOSED WNPL
40.0 dBu CONTOUR
(F(50,10) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	----- HORIZONTAL ----- RELATIVE FIELD (dBk) ERP (kW)			DISTANCE TO CONTOUR (km)
0.0 *	166.1	243.9	1.000	0.33	1.080	81.5
10.0	153.0	257.0	1.000	0.33	1.080	82.8
20.0	157.0	253.0	1.000	0.33	1.080	82.4
30.0	148.7	261.3	1.000	0.33	1.080	83.2
40.0	151.5	258.5	1.000	0.33	1.080	82.9
45.0 *	148.3	261.7	1.000	0.33	1.080	83.2
50.0	152.5	257.5	1.000	0.33	1.080	82.8
60.0	147.1	262.9	1.000	0.33	1.080	83.4
70.0	148.5	261.5	1.000	0.33	1.080	83.2
80.0	143.5	266.5	1.000	0.33	1.080	83.7
90.0 *	154.8	255.2	1.000	0.33	1.080	82.6
100.0	159.1	250.9	1.000	0.33	1.080	82.2
110.0	163.0	247.0	1.000	0.33	1.080	81.8
120.0	174.2	235.8	1.000	0.33	1.080	80.7
130.0	181.3	228.7	1.000	0.33	1.080	79.9
135.0 *	191.5	218.5	1.000	0.33	1.080	78.8
140.0	211.6	198.4	1.000	0.33	1.080	76.3
150.0	231.1	178.9	1.000	0.33	1.080	73.9
160.0	210.9	199.1	1.000	0.33	1.080	76.4
170.0	215.7	194.3	1.000	0.33	1.080	75.8
180.0 *	199.5	210.5	0.940	-0.20	0.954	76.2
190.0	196.1	213.9	0.780	-1.82	0.657	71.6
200.0	189.4	220.6	0.720	-2.52	0.560	70.3
210.0	200.3	209.7	0.740	-2.28	0.591	69.8
220.0	200.7	209.3	0.790	-1.71	0.674	71.4
225.0 *	200.1	209.9	0.830	-1.28	0.744	72.8
230.0	185.7	224.3	0.880	-0.78	0.836	76.0
240.0	185.6	224.4	1.000	0.33	1.080	79.4
250.0	180.8	229.2	1.000	0.33	1.080	80.0
260.0	192.6	217.4	1.000	0.33	1.080	78.6
270.0 *	180.2	229.8	1.000	0.33	1.080	80.0
280.0	161.7	248.3	1.000	0.33	1.080	81.9
290.0	150.1	259.9	1.000	0.33	1.080	83.1
300.0	155.7	254.3	0.800	-1.60	0.691	76.6
310.0	143.5	266.5	0.640	-3.54	0.442	72.0
315.0 *	154.3	255.7	0.640	-3.54	0.442	71.0
320.0	154.4	255.6	0.640	-3.54	0.442	70.9
330.0	155.3	254.7	0.680	-3.02	0.499	72.4
340.0	164.3	245.7	0.800	-1.60	0.691	75.8
350.0	179.5	230.5	1.000	0.33	1.080	80.1

AVERAGE(*) : 174.3 meters

TABLE 2.3(c)

PROPOSED WNPL
40 dBu CONTOUR

Mount Juliet Broadcasting, Inc.
Belle Meade, TN

